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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

TYLER BURNARD,
MICHAEL BRITZIUS,
DOUGLAS STYLES,

Plaintiffs,

v.

ADAM GIBLIN, Personally,
DELORES MATTEUCCI, Personally,
PATRICK ALLEN, Personally,

Defendants.

Case No. 6:22-cv-01982-MC

DECLARATION OF SARA DEL RUBIN IN
SUPPORT OF STATE DEFENDANTS'
MOTION FOR EXTENSION OF TIME TO
FILE DISPOSITIVE MOTIONS

I, Sara Del Rubin, declare:

1. I am an attorney licensed to practice law in the State of Oregon and admitted to practice before the United States District Court for the District of Oregon. I am employed as an Assistant Attorney General with the Oregon Department of Justice. I am currently assigned to represent defendants Giblin, Matteucci, and Allen in the above-captioned case.

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2. I make this declaration in support of defendants' motion for extension of time to file dispositive motions and under penalty of perjury. I have personal knowledge of and am competent to testify to the facts herein.

3. The current dispositive motion deadline in this case is August 12, 2024.

4. Counsel for plaintiffs and I conferred about this motion previously, and counsel's position was that both the discovery and dispositive motion deadlines should be extended. Plaintiffs' counsel subsequently filed their motion for extension of time, to which defendants did not object.

5. If this Court does not grant plaintiffs' unopposed motion for extension of discovery and dispositive motion deadlines, defendants respectfully request that the deadline to file dispositive motions be extended 45 days up to and including September 26, 2024. A necessary staff member was out of the office last week and counsel for defendants previously was focused on preparing a response to plaintiffs' motion for preliminary injunction.

6. This request is made in good faith and not for the purpose of unnecessary delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on August 12, 2024.

s/ Sara Del Rubin
SARA DEL RUBIN
Assistant Attorney General